

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO. 1:24-CR-20188-RAR-5

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS VELEZ,

Defendant.

/

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, CARLOS VELEZ, who, by and through the undersigned counsel, moves this Honorable Court to Modify his Conditions of Release to Allow for Temporary Travel, and, as grounds thereof, states as follows:

1. The Defendant is scheduled for sentencing on Monday, August 28, 2025.
2. The Defendant would like to see his mother, Martha Collins, prior to his sentencing.
3. The Defendant's mother is a resident of New York and the Defendant would be staying at 675 Seabury Avenue, Franklin Square, New York 11010 for the entire duration of the travel.
4. The Defendant would drive in order to travel to New York and to return to the Southern District of Florida.
5. The proposed dates of travel are Saturday, July 5, 2025, to Friday, July 25, 2025.
6. US Probation Officer Mackenzie Hilaire has been advised of this request and does

not object.

7. AUSA Katherine Guthrie has been advised of this request and does not object.

WHEREFORE, the Defendant respectfully prays that this Honorable Court grant this Motion for Permission to Travel to see his family prior to sentencing.

Respectfully submitted,
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/s/ *Saam Zangeneh*

By: Saam Zangeneh, Esq.
Fla. Bar No.: 526721

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Permission to Travel has been electronically filed this 2nd day of July, 2025.

/s/ *Saam Zangeneh*
By: Saam Zangeneh, Esq.